

B19-27396

RJL\alb

01/29/2019

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - CINCINNATI

IN RE:)	CHAPTER 13
)	
STANLEY K VICKERS)	CASE NO. 19-10010
KATHY J VICKERS)	
)	JUDGE JEFFERY P. HOPKINS
Debtors)	
)	OBJECTION TO CONFIRMATION
)	OF THE CHAPTER 13 PLAN
)	
)	** PROPERTY ADDRESS
)	400 Lee Place
)	Trenton, OH 45067

Now comes MTGLQ INVESTORS, L.P. a creditor herein holding a secured claim on the residence of the debtors and hereafter, pursuant to 11 U.S.C., Section 1324 objects to the confirmation of the within Chapter 13 plan for the reasons set forth:

1. The debtors are in possession and use of the property and are unable or have not been given adequate protection against further deterioration or depletion of the property which is secured by the mortgage of MTGLQ Investors, L.P., including but not limited to the payment of real estate taxes and maintenance of adequate insurance.

2. There is no equity in the real estate which is secured by the mortgage of MTGLQ Investors, L.P., or, if there is equity, it is of insignificant value.

3. The plan does not comply with 11 U.S.C Section 1322(b)(5) as the plan does not provide for the curing of arrearages within a reasonable time, which arrearages are in the sum of \$6,523.75.

4. The Objection that is raised herewith is a standing Objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

/s/ Richard J. LaCivita
Reimer Law Co.
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Notice

Parties in interest shall take notice that the within Objection of MTGLQ INVESTORS, L.P. to confirmation of Chapter 13 Plan shall come on for hearing on the 26th day of March, 2019 at 2:00 p.m., in conjunction with the Confirmation Hearing in the within matter.

/s/ Richard J. LaCivita
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CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing Objection to Confirmation was served (i) **electronically** on the date of filing through the court's ECF System on all ECF participants register in this case at the email address registered with the court and (ii) **by ordinary U.S. Mail** on January 29, 2019 addressed to:

1. Stanley K Vickers
Kathy J Vickers, Debtors
400 Lee Place
Trenton, OH 45067
2. Butler County Treasurer
130 High Street
Hamilton, OH 45011

/s/ Richard J. LaCivita
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